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December 4, 2002

Mr. Rodney Struck
Oregon Department of Environmental Quality
2020 SW 4th Avenue, Suite 400
Portland, Oregon 97201

**Subject: Terminal 1 South
Removal Action Work Plan Addendum
ECSE File No. 2042**

Dear Mr. Struck:

The Port of Portland (Port) has prepared an addendum to Section 3.0 (Objectives and Rationale) of the Terminal 1 (T1) South Removal Action Work Plan, dated June 13, 2002.

In the Removal Action Work Plan, cleanup levels as established in the feasibility study were set as the initial removal action cleanup objectives. The feasibility study established cleanup levels based on conservative default exposure parameters. Conservative default exposure parameters rather than site-specific parameters were used in selection of the cleanup levels due to the following:

- Based on site characterization results and the removal of contaminated soil to reduce risk to support future site use, it was suspected that, at the conclusion of the removal action, low levels of PAHs would remain.
- Use of the default exposure parameters would streamline the removal action process resulting in reduced costs and attaining project deadlines for closure of the site.

Based on these feasibility study cleanup levels, the Oregon Department of Environmental Quality (DEQ) completed a Record of Decision (ROD) for the selected remedial action at the site. The selected remedial action for the T1S site consisted of the removal of soil up to 15 feet below ground surface (bgs) above cleanup levels protective of future site residents, construction workers, and trench workers. For Parcel 2 (Area B), risk-based decisions required excavation to 3 feet. Additional excavation to 10 feet was completed to address TPH contamination. The selected remedial action also included a deed restriction to assure that future land use remained consistent with the selected remedy.

During construction activities on Parcel 2, confirmation sampling was conducted in accordance with the Removal Action Work Plan and associated DEQ comments. Confirmation sampling analytical results were compared to the feasibility study established cleanup levels for verification of attainment of the removal action objectives. Due to the difficulty attaining PAH (predominantly benzo(a)pyrene) levels below the cleanup levels, a re-evaluation of more applicable, site specific cleanup goals was performed. Based on this

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re-evaluation, PAH cleanup goals under the urban residential exposure scenario were calculated using exposure parameters provided by the DEQ. Based on these calculations, DEQ prepared an amendment to the ROD to revise the cleanup goals for shallow (0 to 3 feet bgs) soil. The proposed amendment was available for public review and comment in November 2002. No comments were received during the public comment period.

The attached T1S Removal Action Work Plan Addendum incorporates changes to the human health risk assessment for the urban residential exposure scenario and is consistent with the T1S ROD Amendment.

Please contact me at (503) 944-7533 with any questions. Your prompt attention is appreciated.

Sincerely,



Joe Mollusky
Environmental Project Manager
Properties and Development Services

Attachments (2): T1S Removal Action Work Plan Addendum
 Table 1 – Soil Cleanup Goals

cc: Bill Bach, Port
 Jeff Bachrach, Ramis Crew Corrigan & Bachrach
 Herb Clough, Hart Crowser
 Tim Ralston, Ralston Investments
 Rick Schwarz, Anchor Environmental
 Anne Summers, Port

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Terminal 1 South Removal Action Work Plan Addendum

3.0 OBJECTIVES AND RATIONALE

The objectives for the T1S Parcel 3 (Area A) Site are to:

- Remove soil exceeding cleanup goals (as described below); and
- Remove contaminated soil to reduce risk to support future site use.

Removal Action Cleanup Objective. The project cleanup goals for the Parcel 3 (Area A) portion of the RA are presented in Table 1. These cleanup goals were established based on the urban residential exposure scenario and a 1×10^{-6} excess cancer risk for individual carcinogens. The final cleanup extent will be determined based on the confirmational sampling results and the residual risk assessment calculations.

Table 1 - Applicable Soil Cleanup Goals
Terminal 1 South, Parcel 3 (Area A) Removal Action Report Addendum
Portland, Oregon

COPC	Urban Residential Levels in mg/kg
Applicable Depth Interval (feet from ground surface)	0 - 3
Total TPH-Dx	750
PAHs	
Benzo(a)anthracene	2.9
Benzo(a)pyrene	0.29
Benzo(b)fluoranthene	2.9
Dibenz(a,h)anthracene	0.29
Indeno(1,2,3-cd)pyrene	2.9

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Notes:

1. TPH-Dx = Total Petroleum Hydrocarbons as Diesel.
2. Cleanup Goals for TPH-Dx is the Urban Resident Child Concentration developed by Hoyt Street Yards (see Hart Crowser 2002b).
3. Cleanup Goals for PAHs based on urban resident exposure scenario and a 1×10^{-6} excess cancer risk for individual carcinogens.